



CROSSROADS ADOPTION SERVICES

a licensed, non-profit, child-placement & assistance agency

December 9, 2003

To Whom It May Concern:

Crossroads Adoption Services recommends "recognition of compliance" with identified duplicative standards for those agencies currently accredited by the Council on Accreditation (COA) for inter-country adoption services.

Crossroads Adoption Services understands the importance of the new Hague Accreditation standards and process to ensure compliance with the Inter-country Adoption Act. Currently, Crossroads Adoption Services is accredited by the Council on Accreditation for Inter-country Adoption Services. Having already demonstrated compliance with a number of sufficiently similar standards, we encourage the State Department to allow currently COA accredited organizations to receive credit for compliance this select group of duplicative standards.

"Recognition" provides no unfair benefit to currently accredited agencies, as we will not achieve full accreditation without undergoing the Hague Accreditation and responding to a significant number of additional standards. In sum, all inter-country adoption providers will be held to the exact same requirements regardless of their current voluntary accreditation status, however the documentation and review of duplicative standards (highlighted in this response and the attached crosswalk) would be unnecessary.

Attached is the chart prepared by COA identifying the sufficiently similar standards that warrant recognition. A copy of the complete crosswalk comparison of the regulations and COA standards was provided in COA's comments to the draft regulations, or could be obtained by contacting COA.

Your consideration of this "recognition" is greatly appreciated. It is apparent that all organizations, government oversight bodies and accreditors are pursuing quality standards and in these times of important movement towards accountability it is also important to achieve these outcomes without duplication of effort.

Sincerely,

Ann M. Sinnott
Executive Director